

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MARY DESMOND, THOMAS ZIOBROWSKI, AND PAUL WATTS, on their own behalf and on behalf of other participants in the defendant ERISA Plans,

Plaintiffs,

v.

MORTON C. BATT, ANTHONY L. SCIALABBA, CITISTREET, LLC, WHITE & WILLIAMS, LLP, SCIALABBA & MORRISON, P.C., THE STANDARD AUTOMOTIVE 401(K) PLAN, AND THE STANDARD AUTOMOTIVE EMPLOYER CONTRIBUTION PLAN,

Defendants.

Civil Action No. 05-10355-NG

CITISTREET, LLC'S CORPORATE DISCLOSURE STATEMENT

Pursuant to Local Rule 7.3, defendant CitiStreet, LLC (“CitiStreet”) hereby discloses the following corporate information:

- (a) CitiStreet’s members are State Street Bank and Trust Company and Keeper Holdings LLC;
 - (1) State Street Bank and Trust Company is a wholly-owned subsidiary of State Street Corporation, a publicly traded company.
 - (2) Keeper Holdings LLC’s members are Plaza LLC and SSB Keeper Holdings LLC.
 - (i) Plaza LLC’s sole member is The Travelers Insurance Company, which is a wholly-owned subsidiary of Citigroup Insurance Holding Corporation, which is a wholly-owned subsidiary of

Associated Madison Companies, Inc., which is a wholly-owned subsidiary of Citigroup Inc., a publicly traded company.

- (ii) SSB Keeper Holdings LLC's sole member is Citigroup Global Markets Holding Inc., which is a wholly-owned subsidiary of Citigroup Inc., a publicly traded company.
- (b) No publicly held company directly owns ten percent (10%) or more of CitiStreet.

Respectfully submitted,

CITISTREET, LLC

By its attorneys,

/s/ Henry C. Dinger
Henry C. Dinger (BBO # 125340)
Joshua L. Stayn (BBO # 652344)
GOODWIN PROCTER LLP
Exchange Place
Boston, MA 02109-2881
Tel: (617) 570-1000
Fax: (617) 523-1231

Dated: May 2, 2005

LIBA/1534929.1